

HEARING DATE AND TIME: April 8, 2015 at 10:00 a.m. (Eastern Time)
OBJECTION DEADLINE: March 30, 2014 at 4:00 p.m. (Eastern Time)

Bennette D. Kramer
Schlam Stone & Dolan LLP
26 Broadway
New York, NY 10004
(212) 344-5400
bdk@schlamstone.com

Attorneys for Natixis and Natixis Financial Products Inc.

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re	: Chapter 11 Case No.
	:
LEHMAN BROTHERS HOLDINGS INC., <i>et al.</i> ,	: 08-13555 (JMP)
	:
Debtors.	: (Jointly Administered)
-----X	

**JOINDER OF NATIXIS AND NATIXIS FINANCIAL PRODUCTS INC. TO THE
OBJECTION OF CITADEL ENERGY INVESTMENTS LTD. AND CITADEL EQUITY
FUND LTD. TO THE MOTION TO ALLOW DISCLOSURE OF THE DERIVATIVE
QUESTIONNAIRES PURSUANT TO SECTION 107(a) OF THE BANKRUPTCY CODE**

Natixis and Natixis Financial Products Inc., by and through their undersigned counsel,
hereby join in the objections of Citadel Energy Investments Ltd. and Citadel Equity Fund Ltd.
(the “Citadel Objection to the Motion”) filed to the Motion to Allow Disclosure of the Derivative
Questionnaires Pursuant to Section 107(a) of the Bankruptcy Code (the “Motion”), as follows:

OBJECTION AND JOINDER

Ech of Natixis and Natixis Financial Products Inc. and the Debtors were parties to certain
derivative contracts.

1. Natixis and Natixis Financial Products Inc. hereby join and incorporate by reference the arguments, in their entirety, made by Citadel Energy Investments Ltd. and Citadel Equity Master Fund Ltd. in the Citadel Objection to the Motion [Docket 49030].

WHEREFORE, for the foregoing reasons, Natixis and Natixis Financial Products Inc. respectfully request that this Court deny the Debtors' Motion to Allow Disclosure of the Derivative Questionnaires Pursuant to Section 107(a) of the Bankruptcy Code, and, alternatively, if the Court grants the Motion, direct Debtors to redact all identifying, confidential and proprietary information from any documents disclosed, including any negotiated agreement such as any ISDA Master Agreements and any Guarantees, and grant such other, further or different relief as this Court deems just and proper.

Dated: New York, New York
March 30, 2015

SCHLAM STONE & DOLAN LLP

By: s/ Bennette D. Kramer

Bennette D. Kramer (BK-1269)
Schlam Stone & Dolan LLP
26 Broadway
New York, NY 10004
(212) 344-5400
bdk@schlamstone.com

Attorneys for Natixis and Natixis Financial Products Inc.

OF COUNSEL
Lauren Teigland-Hunt
Teigland-Hunt LLP
127 West 24th Street, 4th Floor
New York, NY 10011
(212) 269-1600
lth@t-hllp.com